1 2 3 4	MAYER BROWN LLP JOHN NADOLENCO (SBN 181128) jnadolenco@mayerbrown.com 350 South Grand Avenue, 25th Floor Los Angeles, CA 90071-1503 Telephone: (213) 229-9500 Facsimile: (213) 625-0248		
5 6 7 8 9 10	LAUREN R. GOLDMAN (pro hac vice) lrgoldman@mayerbrown.com 1221 Avenue of the Americas New York, NY 10020-1001 Telephone: (212) 506-2500 Facsimile: (212) 262-1910 ARCHIS A. PARASHARAMI (pro hac vice) aparasharami@mayerbrown.com 1999 K Street, N.W. Washington, D.C. 20006-1101 Telephone: (202) 263-3000 Facsimile: (202) 263-3300		
12 13 14	Attorneys for Defendant Facebook, Inc.		
15	UNITED STATES DISTRICT COURT		
		DISTRICT COURT	
16		ICT OF CALIFORNIA	
	NORTHERN DISTR		
16 17 18 19	NORTHERN DISTR	ICT OF CALIFORNIA SCO DIVISION Case No.: 3:15-CV-03747-JD [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO FILE	
16 17 18 19 20	NORTHERN DISTRESAN FRANCI IN RE FACEBOOK BIOMETRIC	ICT OF CALIFORNIA SCO DIVISION Case No.: 3:15-CV-03747-JD [PROPOSED] ORDER GRANTING	
16 17 18 19 20 21	NORTHERN DISTRES SAN FRANCI IN RE FACEBOOK BIOMETRIC INFORMATION PRIVACY LITIGATION	ICT OF CALIFORNIA SCO DIVISION Case No.: 3:15-CV-03747-JD [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL	
116 117 118 119 220 221 222	NORTHERN DISTRESAN FRANCI IN RE FACEBOOK BIOMETRIC INFORMATION PRIVACY LITIGATION THIS DOCUMENT RELATES TO:	ICT OF CALIFORNIA SCO DIVISION Case No.: 3:15-CV-03747-JD [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL	
116 117 118 119 220 221 222 223	NORTHERN DISTRESAN FRANCI IN RE FACEBOOK BIOMETRIC INFORMATION PRIVACY LITIGATION THIS DOCUMENT RELATES TO:	ICT OF CALIFORNIA SCO DIVISION Case No.: 3:15-CV-03747-JD [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL	
16 17 18	NORTHERN DISTRESAN FRANCI IN RE FACEBOOK BIOMETRIC INFORMATION PRIVACY LITIGATION THIS DOCUMENT RELATES TO:	ICT OF CALIFORNIA SCO DIVISION Case No.: 3:15-CV-03747-JD [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL	
16 17 18 19 20 21 22 23 24	NORTHERN DISTRESAN FRANCI IN RE FACEBOOK BIOMETRIC INFORMATION PRIVACY LITIGATION THIS DOCUMENT RELATES TO:	ICT OF CALIFORNIA SCO DIVISION Case No.: 3:15-CV-03747-JD [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL	
16 17 18 19 20 21 22 23 24 25	NORTHERN DISTRESAN FRANCI IN RE FACEBOOK BIOMETRIC INFORMATION PRIVACY LITIGATION THIS DOCUMENT RELATES TO:	ICT OF CALIFORNIA SCO DIVISION Case No.: 3:15-CV-03747-JD [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL	
16 17 18 19 20 21 22 23 24 25 26	NORTHERN DISTRESAN FRANCI IN RE FACEBOOK BIOMETRIC INFORMATION PRIVACY LITIGATION THIS DOCUMENT RELATES TO:	ICT OF CALIFORNIA SCO DIVISION Case No.: 3:15-CV-03747-JD [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL	

Having considered Defendant Facebook, Inc.'s Declaration of John Nadolenco in Support

Compelling reasons exist to file the following documents under seal because they

of Filing Defendant Facebook, Inc.'s Documents Under Seal (Dkt. No. 101), IT IS HEREBY

constitute trade secret information for the below-listed reasons, see Kamakana v. City & Cty. of

Honolulu, 447 F.3d 1172, 1179 (9th Cir. 2006) (compelling reasons exist when "court files might

The following documents, which are exhibits to Dkt. No. 97, shall be filed under seal:

have become a vehicle for improper purposes," including the release of trade secrets).

ORDERED THAT:

	Document	Portions to be Sealed	Reasons for Sealing
	Exhibit 1: Facebook Business	Entire document	Contains technical and
	Record of Adam Pezen;		commercial information that is
			confidential to Facebook, the
			disclosure of which would
			likely cause competitive harm
			to Facebook by providing
			direct insight into highly
			confidential and competitively
			sensitive aspects of
			Facebook's internal business
			processes and strategies. <i>See</i> Declaration of Shannon
			Chance in Support of
			Facebook's Pre-Hearing Brief
			¶ 7.
	Exhibit 2: Facebook Business	Entire document	Contains technical and
	Record of Carlo Licata		commercial information that is
			confidential to Facebook, the
			disclosure of which would
			likely cause competitive harm
			to Facebook by providing
			direct insight into highly
			confidential and competitively
			sensitive aspects of
			Facebook's internal business
			processes and strategies. See
			Declaration of Shannon
			Chance in Support of
			Facebook's Pre-Hearing Brief
H			¶ 7.

1			
1	Document	Portions to be Sealed	Reasons for Sealing
2	Exhibit 3: Facebook Business	Entire document	Contains technical and
3	Record of Nimesh Patel		commercial information that is confidential to Facebook, the
4			disclosure of which would
			likely cause competitive harm
5			to Facebook by providing direct insight into highly
6			confidential and competitively
7			sensitive aspects of
			Facebook's internal business
8			processes and strategies. <i>See</i> Declaration of Shannon
9			Chance in Support of
10			Facebook's Pre-Hearing Brief
	Exhibit 4: Deposition	Entire document	¶ 7. Contains technical and
11	Transcript of Mark Pike	Entire document	commercial information that is
12			confidential to Facebook, the
13			disclosure of which would likely cause competitive harm
			to Facebook by providing
14			direct insight into highly
15			confidential and competitively sensitive aspects of
16			Facebook's internal business
			processes and strategies. See
17			Declaration of Mark Pike in
18			Support of Facebook's Pre- Hearing Brief ¶ 18.
19	Exhibit 5: Deposition	Entire document	Contains technical and
	Transcript of Shannon Chance		commercial information that is
20			confidential to Facebook, the disclosure of which would
21			likely cause competitive harm
22			to Facebook by providing
			direct insight into highly confidential and competitively
23			sensitive aspects of
24			Facebook's internal business
25			processes and strategies. <i>See</i> Declaration of Shannon
			Chance in Support of
26			Facebook's Pre-Hearing Brief
27			¶ 7.

2

28

1	Document	Portions to be Sealed	Reasons for Sealing
2	Exhibit 9: Deposition	Entire document	Contains trade secret
3	Transcript of Joachim De Lombaert		information, including information relating to
4			Facebook's proprietary source code, information relating to
5			how Facebook utilizes source code to re-create simulations
6			of historical web pages, and
7			information relating to how Facebook compiles and stores
8			its proprietary information <i>See</i> Declaration of Joachim De
9			Lombaert in Support of
10			Defendant Facebook, Inc.'s Pre-Hearing Brief ¶ 31.
11			
12			
13	IT IS SO ORDERED.		
14			
15	DATED: September 30, 2016		γ
16		(_	
17	Honorable James Donato United States District Judge		
10		,	S